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PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Hill-Rom Inc.
1125 East Pearl Street
Batesville, Indiana 47006**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17. This permit also addresses National Emission Standards for Hazardous Air Pollutants for Surface Coating of Metal Furniture, 40 CFR 63, Subpart RRRR, promulgated on May 23, 2003 for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-7-10.5, applicable to those conditions.

Operation Permit No.: T137-17585-00002	
Issued by: Original signed by Paul Dubenetzky Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: March 18, 2004 Expiration Date: March 18, 2009



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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a hospital bed and support furniture manufacturing operation.

Responsible Official:	Anthony Orsini
Source Address:	1125 East Pearl Street, Batesville, IN 47006
Mailing Address:	1069 State Route 46 E, Batesville, IN 47006
SIC Code:	2599
County Location:	Ripley
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) metal coating spray booth using high volume low pressure (HVLP) spray method, identified as EU 01, with a maximum capacity of 8 units per hour, using dry filters for overspray control, and exhausting to stacks #1 and #6.
- (b) Wood surface coating operations, identified as EU 02, consisting of the following operations:
 - (1) One (1) wood chair surface coating line, identified as the 142 Chair line, consisting of the following:
 - (A) One (1) stain spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 7.5 units per hour, and exhausting through one (1) exhaust vent, identified as EF-1;
 - (B) One (1) sanding sealer spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one (1) exhaust vent, identified as EF-2; and
 - (C) One (1) topcoat spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one (1) exhaust vent, identified as EF-3.

- (2) One (1) wood chair surface coating line, identified as the 370 Chair line, consisting of the following:
 - (A) One (1) stain spray booth, using an air assisted spray application system, with dry filters for particulate matter overspray control, coating a maximum of 7.5 units per hour, and exhausting through one (1) exhaust vent, identified as EF-4;-3.
 - (B) One (1) sanding sealer spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one (1) exhaust vent, identified as EF-5; and
 - (C) One (1) topcoat spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one (1) exhaust vent, identified as EF-6;
- (3) One (1) wood chair surface coating line, identified as the 125 Chair line, consisting of the following:
 - (A) One (1) stain spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 7.5 units per hour, and exhausting through one (1) exhaust vent, identified as EF-7;
 - (B) One (1) sanding sealer spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one (1) exhaust vent, identified as EF-8; and
 - (C) One (1) topcoat spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one (1) exhaust vent, identified as EF-9;
- (4) One (1) wood cabinet surface coating line, identified as the Cabinet line, consisting of the following:
 - (A) One (1) stain spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 7.5 units per hour, and exhausting through one (1) exhaust vent, identified as EF-10;
 - (B) One (1) sanding sealer spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one (1) exhaust vent, identified as EF-11; and
 - (C) One (1) topcoat spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one (1) exhaust vent, identified as EF-12;
- (5) One (1) router, processing a maximum of 4 units per hour on the Cabinet line, with

a dust collector for particulate matter control, exhausting through (1) stack, identified as S/V-2; and

- (6) One (1) 4" stoke sander, processing a maximum of 1 unit per hour, with a dust collector for particulate matter control, exhausting through one (1) stack, identified as S/V-2.
- (c) Two (2) metal coating wet paint spray booths using high volume low pressure (HVLPP) spray method, identified as EU 03, consisting of the following:
 - (1) One (1) wet paint spray booth, with a maximum rating of 45 units per hour, using dry filters for overspray control and exhausting to stacks #3 and #6.
 - (2) One (1) wet paint spray booth, with a maximum rating of 1200 units per hour, using dry filters for overspray control and exhausting to stacks #3 and #6.
- (d) Two (2) natural gas fired boilers, identified as 07, with a maximum rating of 10.5 MMBtu per hour each and exhausting to stack #7.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment; [326 IAC 6-3-2]
- (b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburning; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations; [326 IAC 6-3-2] and
- (c) Three (3) enclosed powder coat booths.[326 IAC 6-3-2]

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).).

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B.1 Definitions [326 IAC 2-7-1]

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

B.3 Enforceability [326 IAC 2-7-7]

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

B.5 Severability [326 IAC 2-7-5(5)]

B.6 **Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]**

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

- B.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, Northern regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

Northern Regional Office

Telephone Number: 219-245-4870
Facsimile Number: 219-245-4870

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-

7-4(c)(9) be revised in response to an emergency.

- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

- (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
- (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted
- by this permit.
- (b) All previous registrations and permits are superseded by this permit.

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by

the “responsible official” as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.16 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015

Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
 - (2) If IDEM, OAQ upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]

If IDEM, OAQ fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.17 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.(Refer CFR)

B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]
[326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.19 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)

77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.20 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

B.21 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]

Upon presentation of proper identification cards, credentials, and other documents as may be

required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

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- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
 - (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
 - (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds Per Hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

- (a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour. This condition is not federally enforceable.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment

listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment is in operation.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

-
- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
- (A) Asbestos removal or demolition start date;
- (B) Removal or demolition contractor; or
- (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-

10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

- (f) Demolition and renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.8 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any

monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating February 3, 1999.
- (b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.
[326 IAC 1-5-3]

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.14 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5]
[326 IAC 2-7-6]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall be considered a deviation from the

permit.

- (c) The Permittee is not required to take any further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

- (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
- (3) An automatic measurement was taken when the process was not operating.
- (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
- (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant which is used only for purposes of Section 19 of this rule") from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:
- Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

One (1) metal coating spray booth using high volume low pressure (HVLP) spray method, identified as 01, with a maximum capacity of 8 units per hour, using dry filters for overspray control, and exhausting to stacks #1 and #6.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-6]

Pursuant to 326 IAC 8-2-6, (metal furniture coating operations), the volatile organic compound content of coatings applied to metal furniture or any metal component that is assembled into furniture products shall be limited to 3.0 pounds VOC per gallon of coating delivered to the applicator, less water.

D.1.2 Volatile Organic Compounds (VOC) [40 CFR 60.312 (Subpart EE)]

Pursuant to CP 137-3411, issued on May 12, 1994 and 40 CFR 60.312 (Subpart EE) (Surface Coating of Metal Furniture), the metal furniture coating operation shall not discharge into the air in excess of 0.9 kilograms of VOC per liter of coating solids (7.5 pounds VOC per gallon coating solids) applied.

D.1.3 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to 40 CFR 52 Subpart P, the PM from the metal coating spray booth, 01, shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where} \quad E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

D.1.5 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A]

(a) The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the metal coating spray booth coating metal furniture, as designated by 40 CFR 63.4882 (b), except when otherwise specified in 40 CFR 63 Subpart RRRR. The Permittee must comply with these requirements on and after May 23, 2003.

(b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of

this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

D.1.6 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Metal Furniture [40 CFR Part 63, Subpart RRRR] [40 CFR 63.4881] [40 CFR 63.4882]

- (a) The affected source, the facility-wide collection of surface coating of metal furniture units that are associated with coating metal furniture described in 40 CFR 63.4881(a)(1), storage containers and mixing vessels, manual and automated equipment, and all storage containers pumps, and piping that are associated with the operations described in 40 CFR 63.4882 (b) (2) through (b) (4), is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Metal Furniture (40 CFR 63, Subpart RRRR), effective May 23, 2003. Pursuant to this rule, the Permittee must comply with 40 CFR 63, Subpart RRRR on and after May 23, 2006, or accept and meet an enforceable HAP emissions limit below the major source threshold prior to three years after the effective date of the rule. Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- (b) The following emissions units comprise the affected source that is subject to 40 CFR 63, Subpart RRRR:
 - (1) One (1) metal coating spray booth using high volume low pressure (HVLP) spray method, identified as EU 01.
- (c) The definitions of 40 CFR 63, Subpart RRRR at 40 CFR 63.4981 are applicable to the affected source.

D.1.7 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the metal coating spray booth operation shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

Compliance Determination Requirements

D.1.8 Testing Requirements [326 IAC 2-7-6(1), (6)]

Compliance with the limit specified in Condition D.1.2 shall be determined by a performance test conducted in accordance with 40 CFR 60.313.

D.1.9 Volatile Organic Compounds (VOC)

Compliance with the VOC limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3), 326 IAC 8-1-2(a) and 40 CFR 60.313 using formulation data supplied by the coating manufacturer. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4 and 40 CFR 60.313.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.10 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks, while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19] [40 CFR 60.315]

D.1.11 Record Keeping Requirements

- (a) To document compliance with conditions D.1.1 and D.1.2 the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in conditions D.1.1 and D.1.2.
 - (1) The VOC content of each coating material and solvent used less water.
 - (2) The amount of coating material and solvent used on daily basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvent.
 - (3) The volume weighted average VOC content of the coatings used for each day;
 - (4) The daily cleanup solvent usage; and
 - (5) The calculated pounds of VOC per gallon of coating, less water.
- (b) To document compliance with Condition D.1.10, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional

inspections prescribed by the Preventive Maintenance Plan.

- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.12 National Emissions Standards for Hazardous Air Pollutants for Surface Coating of Metal Furniture - Notification Requirements [40 CFR 63, Subpart RRRR]

- (a) Pursuant to 40 CFR 63.4910(a), the Permittee shall submit the notifications in 40 CFR 63.7(b) and (c), 63.8 (f)(4) and 63.9(b) through(e), (h), and (j) that apply to the metal coating spray booth and chosen compliance method by the dates specified.
- (b) Pursuant to 40 CFR 63.4910(b), the Permittee shall submit Initial Notification containing the information specified in 40 CFR 63.9(b) no later than 1 year after the effective date of 40 CFR 63, Subpart RRRR.
- (c) Pursuant to 40 CFR 63.4910(c), the Permittee shall submit a notification of compliance status required by 40 CFR 63.9 (h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.4940 or 40 CFR 63.4950 that applies to the metal coating spray booth. The notification of compliance status report shall contain the information specified in paragraphs (c) (1) through (9) of 40 CFR 63.4910.
- (d) The notifications required by paragraphs (a) through(c) shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Director, Air and Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

D.1.13 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Title V permit.

- (a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Part 70 permit the applicable requirements of 40 CFR 63, Subpart RRRR, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.
- (b) The significant permit modification application shall be submitted no later than August 23, 2005.

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- (c) The significant permit modification application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

One (1) Wood surface coating operations consisting of the following operations:

- (1) One (1) wood chair surface coating line, identified as the 142 Chair line, consisting of the following:
 - (A) One (1) stain spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 7.5 units per hour, and exhausting through one (1) exhaust vent, identified as EF-1;
 - (B) One (1) sanding sealer spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one (1) exhaust vent, identified as EF-2; and
 - (C) One (1) topcoat spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one (1) exhaust vent, identified as EF-3.
- (2) One (1) wood chair surface coating line, identified as the 370 Chair line, consisting of the following:
 - (A) One (1) stain spray booth, using an air assisted spray application system, with dry filters for particulate matter overspray control, coating a maximum of 7.5 units per hour, and exhausting through one (1) exhaust vent, identified as EF-4;
 - (B) One (1) sanding sealer spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one (1) exhaust vent, identified as EF-5; and
 - (C) One (1) topcoat spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one (1) exhaust vent, identified as EF-6;
- (3) One (1) wood chair surface coating line, identified as the 125 Chair line, consisting of the following:
 - (A) One (1) stain spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 7.5 units per hour, and exhausting through one (1) exhaust vent, identified as EF-7;
 - (B) One (1) sanding sealer spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one (1) exhaust vent, identified as EF-8; and
 - (C) One (1) topcoat spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one (1) exhaust vent, identified as EF-9;
- (4) One (1) wood cabinet surface coating line, identified as the Cabinet line, consisting of the following:
 - (A) One (1) stain spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 7.5 units per hour, and exhausting through one (1) exhaust vent, identified as EF-10;
 - (B) One (1) sanding sealer spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one (1) exhaust vent, identified as EF-11; and
 - (C) One (1) topcoat spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one (1) exhaust vent, identified as EF-12;
- (5) One (1) router, processing a maximum of 4 units per hour on the Cabinet line, with a dust collector for particulate matter control, exhausting through (1) stack, identified as S/V-2 and;
- (6) One (1) 4" stoke sander, processing a maximum of 1 unit per hour, with a dust collector for particulate matter control, exhausting through one (1) stack, identified as S/V-2.

(The information describing the process contained in this facility description box is descriptive information and

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR 63, Subpart A]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63, Subpart JJ.

D.2.2 Volatile Organic Compounds (326 IAC 8-2-12)

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, the surface coating applied to wood furniture shall utilize one of the following application methods:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.2.3 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to CP-137-9710, issued on August 6, 1998, and 40 CFR 52 Subpart P, the PM emissions from each of the twelve (12) wood surface coating booths shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.2.4 326 IAC 6-3-2 (Particulate Emissions Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-2 (Particulate Emissions Limitations for Manufacturing Processes), the allowable particulate emission from the woodworking operation, including the router and sander, shall not exceed 0.86 pounds per hour when operating at a process weight rate of 0.098 tons per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.2.5 Wood Furniture NESHAP [40 CFR 63, Subpart JJ]

- (a) The wood furniture coating operation is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (CFR 63, Subpart JJ).
- (b) Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:
 - (1) Limit the Volatile Hazardous Air Pollutant (VHAP) emissions from finishing operations as follows:
 - (a) Use compliance finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of eight-tenths (0.8) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight.
 - (2) Limit VHAP emissions contact adhesives as follows:
 - (A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed two-tenths (0.2) pound VHAP per pound solids.
 - (B) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed two-tenths (0.2) pound VHAP per pound solid.
 - (C) Use a control device to limit emissions.
 - (3) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.

D.2.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

D.2.7 Work Practice Standards [40 CFR 63.803]

The owner or operator of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803:

- (a) Operator training course
- (b) Leak inspection and maintenance plan
- (c) Cleaning and washoff solvent accounting system

- (d) Chemical composition of cleaning and washoff solvents
- (e) Spray booth cleaning
- (f) Storage requirements
- (g) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h)
- (h) Line cleaning
- (i) Gun cleaning
- (j) Washoff operations
- (k) Formulation assessment plan for finishing operations

D.2.8 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the metal coating operation shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

Compliance Determination Requirements

D.2.9 Volatile Organic Compounds (VOC)

Compliance with the VOC limitations contained in Condition D.2.5 shall be determined by reviewing the Certified Product Data Sheets for wood complaint coatings and thinner mixtures, prior to the purchase, to assure they comply with the limits in condition D.2.5.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.10 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks, while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.11 Record Keeping Requirements

- (a) To document compliance with Condition D.2.5, the Permittee shall maintain records in

accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP usage limit established in Condition D.2.5.

- (1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.

- (2) The VHAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.
 - (3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable coating used.
 - (4) The VHAP content in weight percent of each thinner used.
 - (5) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.
- (b) To document compliance with Conditions D.2.10, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections and those additional inspections prescribed by the Preventive Maintenance Plan.
 - (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.12 Reporting Requirements

- (a) A semi-annual Continuous Compliance Report to document compliance with Condition D.2.5 and the Certification form, shall be submitted within thirty (30) calendar days after the end of the each six (6) month period following the first report.

- (b) The reports required in (a) of this condition shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE - 17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

Two (2) metal coating wet paint spray booths using high volume low pressure (HVLV) spray method, identified as EU 03, consisting of the following:

- (a) One (1) wet paint spray booth, with a maximum rating of 45 units per hour ;and
- (b) One (1) wet paint spray booth with a maximum rating of 1200 units per hour.

Both spray booths use dry filters for overspray control and exhaust to stack #3 and 6.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to 40 CFR 52 Subpart P, the PM from the two (2) metal coating booths, EU 03, shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E=4.10P^{0.67}$$

Where E=rate of emission in pounds per hour; and
P=process weight rate in tons per hour

D.3.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

D.3.3 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A]

The provisions of 40 CFR 63 Subpart A - General Provisions. which are incorporated as 326 IAC 20-1-1, apply to the two (2) metal coating wet paint spray booths coating metal furniture, as designated by 40 CFR 63.4882 (b), except when otherwise specified in 40 CFR 63 Subpart RRRR. The Permittee must comply with these requirements on and after May 23, 2003.

D.3.4 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Metal Furniture [40 CFR Part 63, Subpart RRRR] [40 CFR 63.4881] [40 CFR 63.4882]

- (a) The affected source, the facility-wide collection of surface coating of metal furniture units that are associated with coating metal furniture described in 40 CFR 63.4881(a)(1), storage containers and mixing vessels, manual and automated equipment, and all storage containers pumps, and piping that are associated with the operations described in 40 CFR 63.4882 (b) (2) through (b) (4), is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Metal Furniture (40 CFR 63, Subpart RRRR), effective May 23, 2003. Pursuant to this rule, the Permittee must comply with 40 CFR 63, Subpart RRRR on and after May 23, 2006, or accept and meet an enforceable HAP emissions limit below the major source threshold prior to three years after the effective date of the rule. Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- (b) The following emissions units comprise the affected source that is subject to 40 CFR 63, Subpart RRRR:
- Two (2) metal coating wet paint spray booths using high volume low pressure (HVLV) spray method, identified as EU 03, consisting of the following:
- (1) One (1) wet paint spray booth, with a maximum rating of 45 units per hour ;and
(2) One (1) wet paint spray booth with a maximum rating of 1200 units per hour.
- (c) The definitions of 40 CFR 63, Subpart RRRR at 40 CFR 63.4981 are applicable to the affected source.

D.3.5 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from two (2) metal coating wet paint spray booths operation shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.6 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks, while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.7 Record Keeping Requirements

- (a) To document compliance with Condition D.3.6 the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.8 National Emissions Standards for Hazardous Air Pollutants for Surface Coating of Metal Furniture - Notification Requirements [40 CFR 63, Subpart RRRR]

Pursuant to 40 CFR 63.4910(a), the Permittee shall submit the notifications in 40 CFR 63.7(b) and (c), 63.8 (f)(4) and 63.9(b) through(e), (h), and (j) that apply to the metal coating spray booth and chosen compliance method by the dates specified.

- (a) Pursuant to 40 CFR 63.4910(b), the Permittee shall submit Initial Notification containing the information specified in 40 CFR 63.9(b) no later than 1 year after the effective date of 40 CFR 63, Subpart RRRR.
- (b) Pursuant to 40 CFR 63.4910(c), the Permittee shall submit a notification of compliance status required by 40 CFR 63.9 (h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.4940 or 40 CFR 63.4950 that applies to the metal coating spray booth. The notification of compliance status report shall contain the information specified in paragraphs (c) (1) through (9) of 40 CFR 63.4910.
- (c) The notifications required by paragraphs (a) through(c) shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Director, Air and Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

D.3.9 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Title V permit.

- (a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Part 70 permit the applicable requirements of 40 CFR 63, Subpart RRRR, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.
- (b) The significant permit modification application shall be submitted no later than August 23, 2005.
- (c) The significant permit modification application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

Two (2) natural gas fired boilers, identified as EU 07, with a maximum rating of 10.5 MMBtu per hour each and exhausting to stack #7.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Particulate Matter (PM) [326 IAC 6-2-3(3)(d)]

Pursuant to 326 IAC 6-2-3 (3)(d), Particulate emission limitations for sources of indirect heating), the particulate matter emissions from the two (2) 10.5 MMBtu per hour natural gas boilers shall each be limited to 0.8 pounds per MMBTU.

D.4.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B-Preventive Maintenance Plan, of this permit, is required for this facility.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.3 Reporting Requirements

The Permittee shall semi-annually certify, on the form provided, that natural gas was fired in the boiler at all times during the report period. Alternatively the Permittee shall report the number of days during which alternate fuel was burned during the report period.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Hill-Rom Inc.
Source Address: 1125 East Pearl Street, Batesville, IN 47006
Mailing Address: 1069 State Route 46 E, Batesville, IN 47006
Part 70 Permit No.: T137-17585-00002

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- ? Annual Compliance Certification Letter
- ? Test Result (specify) _____
- ? Report (specify) _____
- ? Notification (specify) _____
- ? Affidavit (specify) _____
- ? Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Hill-Rom Inc.
Source Address: 1125 East Pearl Street, Batesville, IN 47006
Mailing Address: 1069 State Route 46 E, Batesville, IN 47006
Part 70 Permit No.: T137-17585-00002

This form consists of 2 pages

Page 1 of 2

- ? This is an emergency as defined in 326 IAC 2-7-1(12)
- ? The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
 - ? The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:

Date/Time Emergency was corrected:

Was the facility being properly operated at the time of the emergency? Y N
Describe:

Type of Pollutants Emitted: TSP, PM-10, SO₂, VOC, NO_x, CO, Pb, other:

Estimated amount of pollutant(s) emitted during emergency:

Describe the steps taken to mitigate the problem:

Describe the corrective actions/response steps taken:

Describe the measures taken to minimize emissions:

If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
Semi-Annual Report**

VOC and VHAP Content - Wood Furniture NESHAP

Source Name: Hill-Rom Inc.
Source Address: 1125 East Pearl Street, Batesville, IN 47006
Mailing Address: 1069 State Route 46 E, Batesville, IN 47006
Part 70 Permit No.: T137-17585-00002
Facility: Wood Surface Coating Operation
Parameter: VOC and VHAPs Content- NESHAP
Limit: (1) Finishing operations -0.8 lb VHAP/lb Solids
(2) Thinners used for on-site formulation of washcoats, basecoats and enamels - 3% VHAP content by weight
(3) All other thinner mixtures - 10% VHAP content by weight
(4) Foam adhesives meeting the upholstered seating flammability requirements - 0.2 lb VHAP/lb Solids
(5) All other contact adhesives - 0.2 lb VHAP/lb Solids
(6) Strippable spray booth material - 0.8 pounds VOC per pound solids

YEAR: _____

Month	Finishing Operations (lb VHAP/lb Solid)	Thinners used for on-site formulation (% by weight)	All other thinner mixtures (% by weight)	Foam adhesives (upholstered) (lb VHAP/lb Solid)	Contact adhesives (lb VHAP/lb Solid)	Strippable spray booth material (lb VOC/lb Solid)
1						
2						
3						
4						
5						
6						

? No deviation occurred in this six month period.

? Deviation/s occurred in this six month period.
Deviation has been reported on:

Submitted by: _____
Title/Position: _____

Signature: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: Hill-Rom Inc.
Source Address: 1125 East Pearl Street, Batesville, IN 47006
Mailing Address: 1069 State Route 46 E, Batesville, IN 47006
Part 70 Permit No.: T137-17585-00002

**This certification shall be included when submitting monitoring, testing reports/results
or other documents as required by this permit.**

Report period

Beginning: _____

Ending: _____

<u>Boiler Affected</u>	<u>Alternate Fuel</u>	<u>Days burning alternate fuel</u>
	<u>From</u>	<u>To</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
Signature:
Printed Name:
Title/Position:
Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Hill-Rom Inc.
Source Address: 1125 East Pearl Street, Batesville, IN 47006
Mailing Address: 1069 State Route 46 E, Batesville, IN 47006
Part 70 Permit No.: T137-17585-00002

Months: _____ to _____ Year: _____

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".	
? NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
? THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	

Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Page 2 of 2

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	

Response Steps Taken:

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management
Office of Air Quality**

**Addendum to the
Technical Support Document (TSD) for a Part 70 Operating Permit Renewal**

Source Background and Description

Source Name: Hill-Rom Inc.
Source Location: 1125 East Pearl Street, Batesville, IN 47006
County: Ripley
SIC Code: 2599
Operation Permit No.: T137-17585-00002
Permit Reviewer: RT / EVP

On December 12, 2003, the Office of Air Quality (OAQ) had a notice published in The Herald Tribune in Batesville, Indiana, stating that Hill-Rom Inc. had applied for a Part 70 Operating Permit Renewal for the operation of stationary hospital furniture and support furniture manufacturing plant. The notice also stated that OAQ proposed to issue a Part 70 Operating Permit Renewal for this operation and provided information on how the public could review the proposed Part 70 Operating Permit Renewal and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Part 70 Operating Permit Renewal should be issued as proposed.

Upon further review, the OAQ has decided to make the following changes to the Part 70 Operating Permit renewal. Bolded language has been added and the language with a line through it has been deleted.

1. Condition B.21 has been updated to add a "citation".

B.21 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] **[IC 13-17-3-2]**

2. Conditions C.8, C.13 and C.18 have been updated to change "source" to "Permittee".

C.8 Performance Testing [326 IAC 3-6]

- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the ~~source~~ **Permittee** submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

If a regulated substance as defined in is present at a source in more than a threshold quantity, the ~~source~~ **Permittee** must comply with the applicable requirements of 40 CFR 68.

C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The ~~source~~ **Permittee** shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).

3. Condition C.14 (b)(3) has been updated.

C.14 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be **ten** (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. **The notification shall also include** the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Part 70 Operating Permit Renewal

Source Background and Description

Source Name: Hill-Rom Inc.
Source Location: 1125 East Pearl Street, Batesville, IN 47006
County: Ripley County
SIC Code: 2599
Operation Permit No.: T137-17585-00002
Permit Reviewer: Rajesh Thotakura

The Office of Air Quality (OAQ) has reviewed a Part 70 renewal application from Hill-Rom Inc., relating to the manufacturing of hospital furniture and support furniture. Hill-Rom Inc., Ritter Plant was issued Part 70 permit no. T137-6026-00002 on January 12, 1999.

Permitted Emission Units and Pollution Control Equipment

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) metal coating spray booth using high volume low pressure (HVLP) spray method, identified as EU 01, with a maximum capacity of 8 units per hour, using dry filters for overspray control, and exhausting to stacks #1 and #6.
- (b) Wood surface coating operations, identified as EU 02, consisting of the following operations:
 - (1) One (1) wood chair surface coating line, identified as the 142 Chair line, consisting of the following:
 - (A) One (1) stain spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 7.5 units per hour, and exhausting through one (1) exhaust vent, identified as EF-1;
 - (B) One (1) sanding sealer spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one (1) exhaust vent, identified as EF-2; and
 - (C) One (1) topcoat spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one (1) exhaust vent, identified as EF-3.
 - (2) One (1) wood chair surface coating line, identified as the 370 Chair line, consisting of the following:
 - (A) One (1) stain spray booth, using an air assisted spray application system,

with dry filters for particulate matter overspray control, coating a maximum of 7.5 units per hour, and exhausting through one (1) exhaust vent, identified as EF-4;

- (B) One (1) sanding sealer spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one (1) exhaust vent, identified as EF-5; and
 - (C) One (1) topcoat spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one (1) exhaust vent, identified as EF-6;
- (3) One (1) wood chair surface coating line, identified as the 125 Chair line, consisting of the following:
- (A) One (1) stain spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 7.5 units per hour, and exhausting through one (1) exhaust vent, identified as EF-7;
 - (B) One (1) sanding sealer spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one (1) exhaust vent, identified as EF-8; and
 - (C) One (1) topcoat spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one (1) exhaust vent, identified as EF-9;
- (4) One (1) wood cabinet surface coating line, identified as the Cabinet line, consisting of the following:
- (A) One (1) stain spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 7.5 units per hour, and exhausting through one (1) exhaust vent, identified as EF-10;
 - (B) One (1) sanding sealer spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one (1) exhaust vent, identified as EF-11; and
 - (C) One (1) topcoat spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one (1) exhaust vent, identified as EF-12;
- (5) One (1) router, processing a maximum of 4 units per hour on the Cabinet line, with a dust collector for particulate matter control, exhausting through (1) stack, identified as S/V-2; and

- (6) One (1) 4" stoke sander, processing a maximum of 1 unit per hour, with a dust collector for particulate matter control, exhausting through one (1) stack, identified as S/V-2.
- (c) Two (2) metal coating wet paint spray booths using high volume low pressure (HVLP) spray method, identified as EU 03, consisting of the following:
 - (1) One (1) wet paint spray booth, with a maximum rating of 45 units per hour, using dry filters for overspray control and exhausting to stacks #3 and #6.
 - (2) One (1) wet paint spray booth, with a maximum rating of 1200 units per hour, using dry filters for overspray control and exhausting to stacks #3 and #6.
- (d) Two (2) natural gas fired boilers constructed in 1977, identified as 07, with a maximum rating of 10.5 MMBtu per hour each and exhausting to stack #7.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Emission Units and Pollution Control Equipment

There are no new facilities to be reviewed.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) three (3) enclosed powder coat booths;
- (b) natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour;
- (c) equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu per hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu per hour;
- (d) combustion source flame safety purging on startup;
- (e) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons;
- (f) the following VOC and HAP storage containers:
Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons;
- (g) application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings;

- (h) machining where an aqueous cutting coolant continuously floods the machining interface;
- (i) the following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment;
- (j) closed loop heating and cooling system;
- (k) infrared cure equipment;
- (l) water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs;
- (m) heat exchanger cleaning and repair;
- (n) paved and unpaved roads and parking lots with public access;
- (o) blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower;
- (p) stationary fire pumps;
- (q) grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburning; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations;
- (r) purge double block and bleed valves;
- (s) filter or coalescer media changeout;
- (t) flow line in the electronics circuit board assembly department;
- (u) arm pad glue station in the upholstery department;
- (v) paint mixing tanks; and
- (w) application of quick drying spray can paint for repair of scratches and nicks that occur during assembly.

Existing Approvals

The source has been operating under the following previous approvals:

- (a) Part 70 Permit No. T137-6026-00002, issued on January 12, 1999;
- (b) First administrative amendment No. 137-12054-00002, issued on October 24, 2000; and
- (c) First Reopening No. R137-13464-00002, issued on January 4, 2001.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised or deleted by this permit. All previous approvals are superseded by this permit.

The conditions from the previous approvals have been revised in this Part 70 permit as follows:

- (a) Part 70 Permit No. T137-6026-00002, issued on January 13, 1999, Condition D.2.5

D.2.5 Wood Furniture NESHAP [40 CFR 63, Subpart JJ]

- (a) The wood furniture coating operation is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (CFR 63, Subpart JJ), with a compliance date of immediately upon startup.
- (b) Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:
 - (1) Limit the Volatile Hazardous Air Pollutant (VHAP) emissions from finishing operations as follows:
 - (A) Achieve a weighted average VHAP content across all coatings of eight-tenths (0.8) pound VHAP per pound solids; or
 - (B) Use compliance finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of eight-tenths (0.8) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; or
 - (C) Use a control device to limit emissions; or
 - (D) Use a combination of (A), (B), and (C).
 - (2) Limit VHAP emissions contact adhesives as follows:
 - (A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed two-tenths (0.2) pound VHAP per pound solids.
 - (B) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed two-tenths (0.2) pound VHAP per pound solid.
 - (C) Use a control device to limit emissions.
 - (3) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.:

Reason Changed: The source decided to use condition D.2.5 (b) (1)(B) to limit the volatile Hazardous Air Pollutant (VHAP) emissions from finishing operations. Therefore, D.2.5 (b) (1) (A), (C) & (D) are removed herein from condition D.2.5.

- (b) Part 70 No. T137-6026-00002, issued on January 13, 1999, Condition D.2.7

D.2.7 Work Practice Standards [40 CFR 63.803]

The owner or operator of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan within sixty (60) calendar days after the compliance date. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803:

- (a) Operator training course
- (b) Leak inspection and maintenance plan
- (c) Cleaning and washoff solvent accounting system
- (d) Chemical composition of cleaning and washoff solvents
- (e) Spray booth cleaning
- (f) Storage requirements
- (g) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h)
- (h) Line cleaning
- (i) Gun cleaning
- (j) Washoff operations
- (k) Formulation assessment plan for finishing operations

Reason Changed: In Condition D.2.7, the statement "sixty (60) calendar days after the compliance date" is removed from this renewal. The source has prepared and submitted work practice implementation plan to IDEM, on October 5, 1998, to fulfill the requirement of 40 CFR 63.803. The plan has details about how the source will incorporate environmentally desirable practices into the operation.

- (c) Part 70 No. T137-6026-00002, issued on January 13, 1999, Condition D.2.8

D.2.8 Testing Requirements [326 IAC 2-7-6(1), (6)][40 CFR 63, Subpart JJ]

- (a) Pursuant to 40 CFR 63, subpart JJ, if the Permittee elects to demonstrate compliance using 63.804(a)(3) or 63.804(c)(2) or 63.804(d)(3) or 63.804(e)(2), performance testing must be conducted in accordance with 40 CFR 63, Subpart JJ and 326 IAC 3-6.
- (b) IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the limits specified in Condition D.2.3, D.2.4 or D.2.5 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Reason Changed: Condition D.2.8 (a) is removed from this renewal. The compliance requirements 63.804(a)(3) or 63.804(c)(2) or 63.804(d)(3) or 63.804(e)(2) are applicable only if control equipment is used to comply with the emissions standard. The source is not using control equipment to comply with emission standards, instead it is reviewing Certified Product Data Sheets provided by the manufacturer, prior to the purchase, to assure the coating and thinner mixtures meet the emissions standards.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on April 14, 2003. Additional information was received on August 29, 2003 and September 2, 2003. There was no notice of completeness letter mailed to the source.

Emission Calculations

See Appendix A of this document for detailed emissions calculations, pages 1 through 13.

Potential to Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

The source was issued a Part 70 operating permit on January 12, 1999. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of this Part 70 operating permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/ facility	Potential to Emit (tons/year)							
	PM	PM-10	SO ₂	NO _x	VOC	CO	Single HAP	HAPs
EU 01	8.73	8.73	0	0	15.34	0	> 10	15.06
EU 02	17.66	17.66	0	0	142.74	0	> 10	32.92
EU 03	4.86	4.86	0	0	45.45	0	> 10	31.62
Nat. Gas Operations	0.2	0.7	0.1	9.2	0.5	7.7	< 10	0.165
Insignificant Activities	0	0	0	0	7.8	0	< 10	0

- (a) (1) The potential to emit (as defined in 326 IAC 1-2-55) VOC is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7; and
- (2) The potential to emit (as defined in 326 IAC 1-2-55) of any single HAP is equal to or

greater than ten (10) tons per year and The potential to emit (as defined in 326 IAC 1-2-55) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects 2002 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	0.49
PM-10	0.49
SO ₂	0.01
VOC	32.69
CO	1.08
NO _x	3.36
Toluene	4.22
Methanol	0.55
Xylene	1.27
MEK	1.69

County Attainment Status

The source is located in Ripley County.

Pollutant	Status
TSP	attainment
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Ripley County has been designated as maintenance for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2
- (b) Ripley County has been classified as attainment for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant

Deterioration (PSD), 326 IAC 2-2.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

40 CFR 60.312, Subpart EE

The metal furniture coating operation, identified as EU 01, is subject to the New Source Performance Standard, 40 CFR 60.312 (Subpart EE) (Surface Coating of Metal Furniture). The metal furniture coating operation, EU 01, shall not discharge into the air in excess of 0.9 kilograms of VOC per liter of coating solids (7.5 pounds VOC per gallon coating solids) applied.

Based on the calculations made on page 1 of Appendix A, booth EU 01 is in compliance with this requirement.

The metal furniture coating operation, identified as EU 03, is not subject to the New Source Performance Standard, 40 CFR 60.312 (Subpart EE) (Surface Coating of Metal Furniture) because the two (2) wet paint spray booths (EU 03) were installed on December, 12 1979, prior to the rule applicability date of November 28, 1980.

40 CFR 60 Subpart Dc,

The two (2) natural gas fired boilers, identified as EU 07, are not subject to the New Source Performance Standard, 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units) because they were constructed in 1972, prior to the rule applicability date of June 9, 1989.

40 CFR 63, Subpart JJ

- (a) The wood furniture coating operation is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14 (40 CFR 63, Subpart JJ).
- (b) Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:
 - (1) Limit the volatile hazardous air pollutant (VHAP) emissions from finishing operations as follows:
 - (A) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of 1.0 pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a 3.0 percent

maximum VHAP content by weight. Solvent and thinner mixtures used for other purposes have a 10.0 percent maximum VHAP content by weight; or

- (2) Limit the VHAP emissions contact adhesives as follows:
 - (A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed 1.8 pounds VHAP per pound solids.

- (B) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed 1.0 pound VHAP per pound solids.
- (C) Use a control device to limit emissions.
- (3) The strippable spray booth material shall have a maximum VOC content of 0.8 pounds VOC per pound solids.
- (4) The source shall prepare and submit work practice and implementation plan which must define environmentally desirable work practices for each of wood furniture manufacturing operation. The work practice implementation plan must address each of the following work practice standards given below:
 - (A) Operator training course
 - (B) Leak inspection and maintenance plan
 - (C) Cleaning and washoff solvent accounting system
 - (D) Chemical composition of cleaning and washoff solvents
 - (E) Spray booth cleaning
 - (F) Storage requirements
 - (G) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h)
 - (H) Line cleaning
 - (I) Gun cleaning
 - (J) Washoff operations
 - (K) Formulation assessment plan for finishing operations

Note: The source has prepared and submitted work practice implementation plan to IDEM, on October 5, 1998, to fulfill the requirement of 40 CFR 63.803.

- (5) A semi-annual summary report shall be submitted to IDEM, OAQ, to document the ongoing compliance status of the wood furniture coating operations.
- (c) The requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not applicable to wood furniture coating operation. Such requirements apply to a pollutant-specific emissions unit (PSEU), as defined in 40 CFR 64.1, at a major source that is required to obtain a Part 70 or 71 permit if the PSEU meets the following criteria:
 - (1) the unit is subject to an emission limitation or standard for an applicable regulated air pollutant,
 - (2) the unit uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard, and
 - (3) the unit has a potential to emit (PTE) before controls equal to or greater than 100 percent of the amount (tons per year) of the pollutant required for a source to classified as a Part 70 major source.

This source was issued initial Part 70 permit No.T137-6026-00002 on January 13, 1999.

The PSEU as wood surface coating operations is a large unit as defined in 40 CFR 64.5 and also has an emission limitation. However, this unit does not use a control device to comply with the emission limitation. Therefore Compliance Assurance Monitoring (CAM) is not applicable to the wood surface coating operations.

40 CFR 63, Subpart RRRR

- (a) The emissions units one (1) metal coating spray booth identified as EU 01 and two (2) metal coating spray booths identified as EU 03 are subject to the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Metal Furniture, 40 CFR 63, Subpart RRRR, promulgated on May 23, 2003.

The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the affected source described in this section except when otherwise specified in 40 CFR 63 Subpart RRRR.

This rule has a future compliance date; therefore, the specific details of the rule and how the Permittee will demonstrate compliance are not provided in the permit. The Permittee shall submit an application for a significant permit modification no later than August 23, 2005 that will specify the option or options for the emission limitations and standards and methods for determining compliance chosen by the Permittee. At that time, IDEM, OAQ will include the specific details of the rule and how the Permittee will demonstrate compliance. In addition, pursuant to 40 CFR 63, Subpart RRRR, the Permittee shall submit:

- (1) The notifications in 40 CFR 63.7(b) and (c), 63.8 (f)(4) and 63.9(b) through (e), (h), and (j) that apply to the affected source and chosen compliance method by the dates specified.
 - (2) The Permittee shall submit initial notification containing the information specified in 40 CFR 63.9(b) no later than May 23, 2004.
 - (3) The Permittee shall submit a notification of compliance status required by 40 CFR 63.9 (h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.4940 or 40 CFR 63.4950 that applies to the affected source. The notification of compliance status report shall contain the information specified in paragraphs (c) (1) through (9) of 40 CFR 63.4910.
- (b) The requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not applicable to EU 01 and EU 03. Such requirements apply to a pollutant-specific emissions unit (PSEU), as defined in 40 CFR 64.1, at a major source that is required to obtain a Part 70 or 71 permit if the PSEU meets the following criteria:
- (1) the unit is subject to an emission limitation or standard for an applicable regulated air pollutant,
 - (2) the unit uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard, and
 - (3) the unit has a potential to emit (PTE) before controls equal to or greater than 100 percent of the amount (tons per year) of the pollutant required for a source to be classified as a Part 70 major source.

This source was issued initial Part 70 permit No.T137-6026-00002 on January 13, 1999.

The PSEU's as EU 01 and EU 03 are large units as defined in 40 CFR 64.5. EU 01 also has an applicable emission limitation. However, EU 01 does not use a control device to comply with the emission limitation. EU 03 does not have an emission limitation. Therefore, Compliance Assurance Monitoring (CAM) requirement is not applicable to emissions units EU 01 and EU 03.

State Rule Applicability - Entire Source

326 IAC 2-4.1-1 (New Source Toxics Control)

This source is not subject to 326 IAC 2-4.1-1, because it is subject to the NESHAP, 326 IAC 20-14, (40 CFR 63, Subpart JJ) and (40 CFR 63, Subpart RRRR).

326 IAC 2-2 (Prevention of Significant Deterioration)

This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories. Therefore, 326 IAC 2-2 (Prevention of Significant Deterioration) is not applicable to this source.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute non overlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability -Individual Facilities

326 IAC 8-2-6 (Metal furniture coating operations)

Pursuant to 326 IAC 8-2-6, the volatile organic compound content of coatings applied to metal furniture or any metal component that is assembled into furniture products shall be limited to 3.0 pounds VOC per gallon of coating delivered to the applicator, less water.

- (a) The emission unit metal coating spray booth (EU 01) is constructed on March 03, 1994 (after July 1, 1990) and the actual VOC emissions from EU 01 are greater than fifteen (15) pounds per day before controls. Pursuant to 326 IAC 8-2-1 (a) (4), the 326 IAC 8-2-6 (Metal furniture coating operations) is applicable to this emission unit.
- (b) The two (2) metal coating wet paint spray booths (EU 03) were installed on December 12, 1979 and the potential VOC emissions from metal furniture operations in the entire source is less than 100 tons per year. Pursuant to 326 IAC 8-2-1 (a) (1), the 326 IAC 8-2-6 (Metal furniture coating operations) is not applicable to this emission unit.

Based on the MSDS submitted by the source and calculations made on page 1 of Appendix A, the paint booth (EU 01) is in compliance with this requirement

326 IAC 6-3-2 (Process Operations)

- (a) Pursuant to 40 CFR 52 Subpart P, the PM from the metal coating spray booth, EU 01, shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

- (b) Pursuant to CP-137-9710, issued on August 6, 1998, and 40 CFR 52 Subpart P, the PM emissions from each of the twelve (12) wood surface coating booths shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{Where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

- (c) Pursuant to 40 CFR 52 Subpart P, the PM from the two (2) metal coating booths, EU 03, shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{Where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

326 IAC 6-3-2 (Particulate Emissions Limitations for Manufacturing Process)

Pursuant to 326 IAC 6-3-2(c), the allowable Particulate emissions rate from the router and sander in the woodworking operation shall be limited to 0.86 pounds per hour based on a process weight rate of 0.098 tons per hour and the following equation:

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour} \\ = 0.098 \text{ tons per hour}$$

$$E = 4.10(0.098)^{0.67} = 0.86 \text{ pounds per hour}$$

Total potential emissions from the woodworking operation, which includes the router and sander, are 2.64 tons per year (or) 0.60 pounds per hour, therefore, the woodworking operation will comply with 326 IAC 6-3-2.

326 IAC 6-3-2 (d) (Particulate)

Pursuant to 326 IAC 6-3-2(d), particulate from the metal coating operation shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture shall utilize one of the following application methods:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

This source uses air assisted airless spray application equipment for wood furniture surface coating, and is therefore in compliance with 326 IAC 8-2-12.

326 IAC 8-11 (Wood Furniture Coatings)

This source is not subject to the requirements of 326 IAC 8-11 because the source is not located in Lake, Porter, Clark, or Floyd Counties.

326 IAC 8-1-1 (VOC rules applicability)

Pursuant to 326 IAC 8-1-1, the soldering operation, which is an insignificant activity, is subject to 326 IAC 8. However, the source was constructed prior to 1974 and potential emissions from the facility are less than 25 tons per month, therefore, there are no limits in this rule applicable to this facility.

Hill-Rom Inc.
Batesville, Indiana
Permit Reviewer: RT/EVP

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326 IAC 6-2-3 (Particulate emissions limitations for sources of indirect heating)

Pursuant to 326 IAC 6-2-3, the particulate matter emissions from the two (2) 10.5 MMBtu per hour natural gas boilers shall be limited to 0.8 pounds per MMBtu (lb/MMBtu), as the lesser of the value P_t computed with the following formula:

$$P_t = (C \cdot a \cdot h) / (76.5 \cdot Q^{0.75} \cdot N^{0.25})$$
$$= (50 \cdot .67 \cdot 27) / (76.5 \cdot 21^{0.75} \cdot 1^{0.25})$$

$P_t = 1.205 \text{ lb/MMBtu}$

where: P_t = pounds of PM emitted per MMBtu heat input (lb/MMBtu)
 C = maximum ground level concentration at critical wind speed ($50 \mu\text{g}/\text{m}^3$)
 a = plume rise factor
 h = stack height (ft)
 Q = total source operating capacity (MMBtu/hr)
 N = number of stacks

Since 1.205 lb/MMBtu is greater than 0.8 lb/MMBtu, therefore the PM emissions from the two gas boilers is limited to 0.8 lb/MMBtu.

Based on calculations made below, the PM emissions from two (2) natural gas fired boilers are 0.02lb /MMBtu. Hence the boilers are in compliance with this requirement.

Compliance determination calculations

The default value is 0.8 pounds per million British thermal units.

The two (2) 10.5 million British thermal units per hour boilers are in compliance:

$$(2 \text{ ton/yr}) (yr/8760 \text{ hr}) (2000 \text{ lb/ton}) (hr/21 \text{ MMBtu}) = 0.014 \text{ pounds per million Btu}$$

$$0.02 \text{ pounds per MMBtu} < 0.8 \text{ pounds per MMBtu}$$

326 IAC 6-3-2 (Particulate Emissions Limitations for Manufacturing Process)

Pursuant to 326 IAC 6-3-2(e), the process weight rate from the soldering and welding equipment, cutting torches, grinding and machining operations and enclosed powder coat booths, which are insignificant activities, is less than one hundred (100) pounds per hour. The allowable emission rate from the recycled trim material recovery is 0.551 pounds per hour.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

- (a) The metal coating spray booth, identified as EU 01, the twelve (12) wood surface coating booths, and the two (2) metal coating wet paint spray booths, identified as EU 03 have applicable compliance monitoring conditions as specified below:
 - (1) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
 - (2) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
 - (3) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters for the spray booths must operate properly to ensure compliance with 326 IAC 6-3-2 and 326 IAC 2-7.

Conclusion

The operation of this hospital furniture and support furniture manufacturing operation shall be subject to the conditions of the attached proposed Part 70 Permit No. T137-17585-00002.

Appendix A: Emissions Calculations

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Potential Emissions from EU 01

Company Name: Hill-Rom Inc.
Address City IN Zip: 1125 East Pearl Street Batesville, In 47006
Title V T137-17585-00002
Reviewer: RT/ EVP
Date: September 2, 2003

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Worst Case VOC & Particulate	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
White L. Neutral	8.8	62.39%	45.9%	16.5%	45.9%	31.00%	0.30000	8.000	2.70	1.46	3.50	84.07	15.34	XXXX	8.73	4.71	75%
Water Taupe	8.8	62.97%	46.4%	16.6%	46.4%	31.90%	0.30000	8.000	2.70	1.45	3.48	83.51	15.24		8.52	4.55	75%

3.50 84.07 15.34 8.73

State Potential Emissions Add worst case coating to all solvents
METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

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Company Name: Hill-Rom Inc.
Address City IN Zip: 1125 East Pearl Street Batesville, In 47006
Title V T137-17585-00002
Reviewer: RT/ EVP
Date: September 18, 2003

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Benzene	Weight % Hexane	Weight % Glycol Ethers	Weight % Methanol	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Benzene Emissions (ton/yr)	Hexane Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Worst case HAPS	Methanol Emissions (ton/yr)
White L. Neutral	8.8	0.300000	8.00	0.00%	0.00%	0.00%	0.00%	16.18%	0.00%	0.00	0.00	0.00	0.00	14.97		0.00
Water Taupe	8.8	0.300000	8.00	0.00%	0.00%	0.00%	0.00%	16.28%	0.00%	0.00	0.00	0.00	0.00	15.06	XXXX	0.00

Total State Potential Emissions	0.00	0.00	0.00	0.00	15.06	0.00
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$$\text{HAPS emission rate (tons/yr)} = \text{Density (lb/gal)} * \text{Gal of Material (gal/unit)} * \text{Maximum (unit/hr)} * \text{Weight \% HAP} * 8760 \text{ hrs/yr} * 1 \text{ ton}/2000 \text{ lbs}$$

Appendix A: Emission Calculations

Potential Emissions from Wood surface coating operations (uncontrolled)

Company Name: Hill-Rom Inc.
 Address City IN Zip: 1125 East Pearl Street, Batesville, Indiana 47006
 Title V 137-17585-00002
 Reviewer: RT/ EVP
 Date: September 2, 2003

Material (as applied)	Worst Case VOC Material from EU 02	Density (Lb/Gal)	Weight % Volatile (H20& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency	
Surface Coating																		
Wipe Stain 546-D1-2909C		8.00	63.72%	0.00%	63.72%	0.00%	21.92%	0.030	30.00	5.1	5.10	4.59	110.11	20.09	2.86	31.01	75.00%	
Wipe Stain 546-WI-3493B		8.34	60.48%	0.00%	60.48%	0.00%	22.65%	0.030	30.00	5.0	5.04	4.54	108.95	19.88	3.25	29.69	75.00%	
Wipe Stain 546-D1-3323A		8.39	59.11%	0.00%	59.11%	0.00%	23.80%	0.030	30.00	5.0	4.96	4.46	107.12	19.55	3.38	27.78	75.00%	
Wipe Stain 546-D1-3419		8.36	50.04%	0.00%	50.04%	0.00%	36.07%	0.030	30.00	4.2	4.18	3.77	90.36	16.49	4.12	15.46	75.00%	
Wipe Stain 560-D5-4908	XXXX	7.80	67.13%	0.00%	67.13%	0.00%	19.70%	0.030	30.00	5.2	5.24	4.71	113.10	20.64	2.53	35.44	75.00%	
Wipe Stain 542-D5V-1666		8.18	62.31%	0.06%	62.25%	0.06%	21.64%	0.030	30.00	5.1	5.09	4.58	109.99	20.07	3.04	31.37	75.00%	
NGR Stain 506-D5V-639		6.61	99.62%	32.15%	67.47%	25.51%	0.25%	0.020	30.00	6.0	4.46	2.68	64.22	11.72	0.02	2378.54	75.00%	
NGR Stain 506-D5V-638		6.68	99.13%	29.37%	69.76%	23.55%	0.61%	0.020	30.00	6.1	4.66	2.80	67.10	12.25	0.04	1018.57	75.00%	
NGR Stain 506-D5V-497		6.64	99.30%	31.23%	68.07%	24.89%	0.44%	0.020	30.00	6.0	4.52	2.71	65.09	11.88	0.03	1369.65	75.00%	
NGR Stain 506-D5-251		6.62	99.60%	23.92%	75.68%	19.01%	0.24%	0.020	30.00	6.2	5.01	3.01	72.14	13.17	0.02	2783.34	75.00%	
NGR Stain 506-D5V-42B		6.70	98.77%	1.00%	97.77%	0.80%	0.78%	0.020	30.00	6.6	6.55	3.93	94.33	17.21	0.05	1119.76	75.00%	
NGR Stain 506-D5V-1159		6.60	99.75%	32.17%	67.58%	25.49%	0.15%	0.020	30.00	6.0	4.46	2.68	64.23	11.72	0.01	3964.69	75.00%	
NGR Stain 543-D6-699	XXXX	7.39	98.36%	0.00%	98.36%	0.00%	1.17%	0.020	30.00	7.3	7.27	4.36	104.67	19.10	0.08	828.35	75.00%	
Toner 371-D5V-610		6.90	93.74%	14.03%	79.71%	11.62%	3.76%	0.020	30.00	6.2	5.50	3.30	79.20	14.45	0.28	195.04	75.00%	
Toner 373-D5V-2136	XXXX	7.72	82.54%	21.40%	61.14%	19.83%	6.00%	0.020	30.00	5.9	4.72	2.83	67.97	12.40	0.89	104.89	75.00%	
Sealer 831-F5V-83A	XXXX	7.68	72.12%	6.25%	65.87%	5.76%	21.17%	0.030	65.00	5.4	5.06	9.86	236.75	43.21	4.57	31.86	75.00%	
Sealer Catalyst 830-PJ1-1019F	XXXX	9.06	39.00%	0.00%	39.00%	0.00%	46.35%	0.002	65.00	3.5	3.53	0.44	10.47	1.91	0.75	10.16	75.00%	
Top Coat 830-55L5-1394	XXXX	7.91	61.44%	0.00%	61.44%	0.00%	29.50%	0.030	65.00	4.9	4.86	9.48	227.44	41.51	6.51	21.97	75.00%	
Top Coat Catalyst 830-PJ1-1019F	XXXX	9.06	39.00%	0.00%	39.00%	0.00%	46.35%	0.002	65.00	3.5	3.53	0.44	10.47	1.91	0.75	10.16	75.00%	
Adhesives																		
Tite Bond 100261		9.67	57.70%	57.60%	0.10%	66.87%	42.20%	0.003	65.00	0.0	0.01	0.00	0.05	0.01	0.00	0.02	100.00%	
Total State Potential Emissions:												32.59	782.16	142.74	17.66			
	Federal Potential Emissions (controlled):																	
otal Federal Potential Emissions:										Control Efficiency:		Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr			
										VOC	PM							
										N/A	92.00%							32.59

Methodology:

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids) * Transfer Efficiency

Total = Sum of worst case coatings used + other solvents

Controlled emission rate = uncontrolled emission rate * (1 - control efficiency)

Appendix A: Emission Calculations***Potential Emissions from Woodworking (Sander + Router) operations***

Company Name: Hill-Rom Inc.
Address City IN Zip: 1125 East Pearl Street, Batesville, Indiana 47006
Title V T137-17585-00002
Reviewer: RT / EVP
Date: September 2, 2003

Emissions Generating Activity			
Materials machined	raw materials being fed (lbs / hr)	Particulate matter emissions (estimated) (lbs /hr)	Particulate matter emissions (tons / yr)
Cabinets	180.00	0.60	2.64
Chairs	15.00	0.01	0.04
Total particulate emissions from Cabinets and chairs			2.68

Note: (1) Total emissions based on rated capacity at 8,760 hours/year.

(2) The estimate is based on the gross weight of the particulate collected in Bag house / Knockout drum capture system from wood working (Sander + Router) operations.

Appendix A: Emission Calculations

Total Potential Emissions (surface coating + woodworking) from Wood operations

Company Name: Hill-Rom Inc.
Address City IN Zip: 1125 East Pearl Street, Batesville, Indiana 47006
Title V T137-17585-00002
Reviewer: RT / EVP
Date: September 2, 2003

Total Potential Emissions (surface coating + woodworking) from Wood operations			
Emissions Generating Activity			
Pollutant	Surface Coating	Woodworking	TOTAL
PM	17.66	2.68	20.3
PM-10	17.66	2.68	20.3
SO2	0.00	0.00	0.0
NOx	0.00	0.00	0.0
VOC	142.74	0.00	142.7
CO	0.00	0.00	0.0
Single HAP	13.76 (Toluene)	0.00	
HAPs	32.92	0.00	32.9
Note: Total emissions based on rated capacity at 8,760 hours/year.			

Company Name: Hill-Rom Inc.
Address City IN Zip: 1125 East Pearl Street, Batesville, Indiana 47006
Title V T137-17585-00002
Reviewer: RT / EVP
Date: September 2, 2003

[illegible]

Appendix A: Emission Calculations

Potential HAP Emission Calculations from surface coating of wood furniture (Page 2 of 2)

Company Name: Hill-Rom Inc.
Address City IN Zip: 1125 East Pearl Street, Batesville, Indiana 47006
Title V T137-17585-00002
Reviewer: RT / EVP
Date: September 2, 2003

Material	Worst Case Scenario for HAPS from EU 02	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Xylene Emissions (ton/yr)	MEK Emissions (ton/yr)	Toluene Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)	Methanol Emissions (ton/yr)	Cumene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Pound VHAP per Pound Solids
Surface Coating												
Wipe Stain 546-D1-2909C		8.00	0.030	30.00	1.06	0.00	0.80	0.24	0.00	0.02	0.00	0.2
Wipe Stain 546-WI-3493B		8.34	0.030	30.00	1.03	0.00	0.81	0.22	0.00	0.02	0.00	0.2
Wipe Stain 546-D1-3323A		8.39	0.030	30.00	0.66	0.00	0.80	0.14	0.00	0.02	0.00	0.1
Wipe Stain 546-D1-3419	XXXX	8.36	0.030	30.00	1.53	0.00	1.70	0.35	0.00	0.02	0.00	0.2
Wipe Stain 560-D5-4908		7.80	0.030	30.00	0.96	0.00	0.56	0.21	0.00	0.02	0.00	0.2
Wipe Stain 542-D5V-1666		8.18	0.030	30.00	0.39	0.00	0.30	0.08	0.00	0.03	0.00	0.1
NGR Stain 506-D5V-639		6.61	0.020	30.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.0
NGR Stain 506-D5V-638		6.68	0.020	30.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.0
NGR Stain 506-D5V-497		6.64	0.020	30.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.0
NGR Stain 506-D5-251		6.62	0.020	30.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.0
NGR Stain 506-D5V-42B		6.70	0.020	30.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.0
NGR Stain 506-D5V-1159		6.60	0.020	30.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.0
NGR Stain 543-D6-699	XXXX	7.39	0.020	30.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.0
Toner 371-D5V-610		6.90	0.020	30.00	0.00	0.47	0.05	0.00	0.00	0.00	0.00	0.5
Toner 373-D5V-2136	XXXX	7.72	0.020	30.00	0.01	1.22	0.61	0.00	0.00	0.00	0.00	0.5
Sealer 831-F5V-83A	XXXX	7.68	0.030	65.00	5.06	0.00	8.96	1.20	0.00	0.00	0.21	0.8
Sealer Catalyst 830-PJ1-1019E	XXXX	9.06	0.002	65.00	0.00	0.00	0.00	0.00	2.51	0.00	0.00	0.8
Top Coat 830-55L5-1394	XXXX	7.91	0.030	65.00	3.45	0.00	2.49	0.82	0.00	0.00	0.25	0.3
Top Coat Catalyst 830-PJ1-1019E	XXXX	9.06	0.002	65.00	0.00	0.00	0.00	0.00	2.51	0.00	0.00	0.8
Adhesives												
Tite Bond 100261		9.67	0.003	65.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.0
					10.06	1.22	13.76	2.37	5.03	0.03	0.47	

Total Potential Emissions:

32.92

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Total = Sum of worst case coatings used + other solvents used.

Pound VHAP per Pound Solids = Weight % VHAP / Weight % Solids

Company Name: Hill-Rom Inc.
Address City IN Zip: 1125 East Pearl Street Batesville, In 47006
Title V T137-17585-00002
Reviewer: RT/ EVP
Date: September 18, 2003

Material	Worst case VOC material (EU 03)	Worst case particulate material (EU 03)	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
KA -241 TU			7.9	75.00%	0.0%	75.0%	0.0%	15.00%	0.02800	45.000	5.89	5.89	7.42	178.04	32.49	2.71	39.25	75%
KA- 270 TU	XXXX		8.2	73.00%	0.0%	73.0%	0.0%	15.00%	0.02800	45.000	5.96	5.96	7.51	180.35	32.91	3.04	39.76	75%
Ever Lube		XXXX	8.5	70.00%	55.0%	15.0%	55.0%	15.00%	0.02800	45.000	2.83	1.28	1.61	38.56	7.04	3.52	8.50	75%

KA -241 TU			7.9	75.00%	0.0%	75.0%	0.0%	15.00%	0.00040	1200.000	5.89	5.89	2.83	67.82	12.38	1.03	39.25	75%
KA- 270 TU	XXXX		8.2	73.00%	0.0%	73.0%	0.0%	15.00%	0.00040	1200.000	5.96	5.96	2.86	68.71	12.54	1.16	39.76	75%
Ever Lube		XXXX	8.5	70.00%	55.0%	15.0%	55.0%	15.00%	0.00040	1200.000	2.83	1.28	0.61	14.69	2.68	1.34	8.50	75%

ETHODOLOGY

surcoat.wk4 9/95

Potential HAP Emissions from EU 03 (Two (2) Wet Spray Paint Booths)

Company Name: Hill-Rom Inc.
Address City IN Zip: 1125 East Pearl Street Batesville, In 47006
Title V T137-17585-00002
Reviewer: RT/ EVP
Date: September 18, 2003

Booth 01

Material	Density	Gallons of Material	Maximum	Weight %	Weight %	Weight %	Weight %	Weight %	Xylene Emissions	Toluene Emissions	MIK Emissions	Butyl Cellosolve Emissions	Glycol Ethers Emissions	Worst case HAP Material	Total
	(Lb/Gal)	(gal/unit)	(unit/hour)	Xylene	Toluene	MIK	Butyl Cellosolve	Glycol Ethers	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)		
KA-241	7.9	0.028000	45.00	11.50%	27.20%	11.60%	2.80%	0.00%	4.69	11.86	5.06	1.22	0.00		22.83
KA- 270	8.2	0.028000	45.00	8.90%	26.80%	11.80%	3.10%	0.00%	4.03	12.13	5.34	1.40	0.00	XXXX	22.90
Ever Lube	8.5	0.02800	45	0.00%	0.00%	0.00%	10.00%	0.00%	0.00	0.00	0.00	4.69	0.00		4.69

Booth 02

KA-241	7.9	0.000400	1200.00	11.50%	27.20%	11.60%	2.80%	0.00%	1.79	4.52	1.93	0.47	0.00		8.70
KA- 270	8.2	0.000400	1200.00	8.90%	26.80%	11.80%	3.10%	0.00%	1.53	4.62	2.03	0.53	0.00	XXXX	8.72
Ever Lube	8.5	0.00040	1200	0.00%	0.00%	0.00%	10.00%	0.00%	0.00	0.00	0.00	1.79	0.00		1.79

Total State Potential Emissions**Add Worst case of Booth 1 and Booth 2****31.62****METHODOLOGY****Worst Case Emissions**

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations

Potential Emissions from Natural Gas Combustion ***MM BTU/HR <100***

Company Name: Hill-Rom Inc.
Address City IN Zip: 1125 East Pearl Street, Batesville, IN 47006
Plt ID: T137-17585-00002
Reviewer: RT / EVP
Date: 2-Sep-02

Heat Input Capacity
MMBtu/hr

21.0

Potential Throughput
MMCF/yr

184.0

Pollutant						
Emission Factor in lb/MMCF	PM* 1.9	PM10* 7.6	SO2 0.6	NOx 100.0 **see below	VOC 5.5	CO 84.0
Potential Emission in tons/yr	0.2	0.7	0.1	9.2	0.5	7.7

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

See page 2 for HAPs emissions calculations.

Appendix A: Emissions Calculations

Natural Gas Combustion Only MM BTU/HR <100 Small Industrial Boiler HAPs Emissions

Company Name: Hill-Rom Inc.
Address City IN Zip: 1125 East Pearl Street, Batesville, IN 47006
Title V: T137-17585-00002
Reviewer: RT / EVP
Date: 2-Sep-02

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	1.932E-04	1.104E-04	6.899E-03	1.656E-01	3.127E-04

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	4.599E-05	1.012E-04	1.288E-04	3.495E-05	1.932E-04

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emission Calculations

Page 12 of 13 TSD App A

Potential Emissions from Insignificant activities

Company Name: Hill-Rom Inc.
Address City IN Zip: 1125 East Pearl Street, Batesville, IN 47006
Title V T137-17585-00002
Reviewer: RT / EVP
Date: 2-Sep-02

Thinner Usage 0.241 gal /hr
Thinner density 6.62 lb/gal

Flux Usage 0.03075 gal/hr
Flux Density 7.52 lb/gal
Weight percent volatiles 67%

Soldering Emissions 1.78 lb/hr = 7.8 tons / year

Methodology:

VOC emissions from thinner = thinner usage (gal/hr) * thinner density (lb/gal)

VOC emissions from flux applicators = flux usage (gal/hr)*flux density (lb/gal)*weight of volatiles

Total emissions = VOC emissions from thinner + VOC emissions from flux applicators

Appendix A: Emission Calculations

Page 13 of 13 TSD App A

Potential Emissions from Entire source (EU 01+ Wood Operations+ EU 03+ Nat. Gas Combustion)

Company Name: Hill-Rom Inc.
Address City IN Zip: 1125 East Pearl Street, Batesville, IN 47006
Title V T137-17585-00002
Reviewer: RT / EVP
Date: 2-Sep-02

Emission Unit	PM	PM-10	SO2	NOx	VOC	CO	Single	HAPS
	(tons / yr)	(tons / yr)	(tons / yr)	(tons / yr)	(tons / yr)	(tons / yr)	HAP	(tons / yr)
EU 01	8.73	8.73	0	0	15.34	0	15.06 (Glycol Ethers)	15.06
Wood Operations	17.66	17.66	0	0	142.74	0	13.76 (Toluene)	32.92
EU 03	4.86	4.86	0	0	45.45	0	16.75 (Toluene)	31.62
Nat. Gas Boiler	0.2	0.7	0.1	9.2	0.5	7.7	negligible	0.165
Insignificant Activities	0	0	0	0	7.8	0	0	0
Total	31.45	31.95	0.1	9.2	211.83	7.7		79.765